

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BENJAMIN BIN CHOW,)	
)	
Plaintiff,)	
)	
v.)	
)	
CANYON BRIDGE CAPITAL PARTNERS,)	
LLC, a Cayman Islands Limited Liability)	
Company, CANYON BRIDGE CAPITAL)	C.A. No. 22-00947-JLH-SRF
MANAGEMENT, LLC, a Delaware Limited)	
Liability Company, CANYON BRIDGE)	
FUND I, LP, a Cayman Islands Limited)	
Partnership, HONG JOHN KAO, HEBER)	
RAYMOND BINGHAM, and PETER CHIN)	
KUO,)	
)	
Defendants.)	

**DECLARATION OF JESSE L. NOA IN SUPPORT OF DEFENDANTS' EMERGENCY
MOTION TO CONTINUE THE INITIAL SCHEDULING CONFERENCE
AND STAY RELATED DEADLINES**

I, Jesse L. Noa, declare:

1. I am a partner in the law firm of Potter Anderson & Corroon LLP, counsel to defendants Canyon Bridge Capital Partners, LLC, Canyon Bridge Fund I, LP, Hong John Kao, Heber Raymond Bingham, and Peter Chin Kuo (collectively "Defendants"), and a member in good standing of the Bar of the Supreme Court of the State of Delaware. Unless otherwise indicated, I have personal knowledge of the matters stated herein and, if called as a witness, I could and would testify competently thereto.

2. On September 6, 2024, Defendants' counsel asked whether plaintiff Benjamin Bin Chow ("Plaintiff") would stipulate to a continuance of the initial scheduling conference and the related deadlines.

3. Later that same day, Plaintiff's counsel responded via email and stated that "[t]his

case has been going on long enough and a conference is needed to help move it along.” A true and correct copy of the September 6, 2024 email chain between Defendants’ and Plaintiff’s counsel is attached hereto as Exhibit A.

4. On September 9, 2024, I called Plaintiff’s Delaware counsel, Daniel Taylor of Smith, Katzenstein & Jenkins LLP, to meet and confer regarding whether Plaintiff would consent to Defendants’ request to extend the time for the Rule 16 conference.

5. Later that same day, Mr. Taylor informed me via email that Plaintiff would not consent to Defendants’ request to extend the time for the Rule 16 conference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 10, 2024

/s/ Jesse L. Noa

Jesse L. Noa (#5973)

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